

KYLE SCHUMACHER (BAR #121887)  
kyle@schumacherlane.com  
**SCHUMACHER LANE PLLC**  
PO Box 558  
Spring Branch, TX. 78070  
503-482-8137 ph  
210-783-1383 fax

Attorneys for Plaintiff  
Melinda Michelle Douglas

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON – PORTLAND DIVISION

Melinda Michelle Douglas,

Plaintiff,

v.

Capital One Bank (USA), National  
Association; Kohl's Inc.; and DOES 1  
through 100 inclusive,

Defendants.

CASE NO. 3:20-cv-00460-JR

VOLUNTARY STIPULATION OF DISMISSAL  
WITH PREJUDICE OF DEFENDANT KOHL'S  
INC. ONLY, PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE 41

**TO THE COURT, CLERK OF COURT, AND ALL PARTIES:**

**PLEASE TAKE NOTICE THAT** Plaintiff Melinda Michelle Douglas, pursuant to Federal Rules of Civil Procedure, Rule 41(a)(1), hereby voluntarily dismisses defendant Kohl's Inc. only, with prejudice, as to all claims in this action.

Federal Rule of Civil Procedure 41(a)(1) provides, in relevant part:

41(a) Voluntary Dismissal

(1) By the Plaintiff

(A) Without a Court Order. Subject to Rules 23(3), 23.1(c), 23.2, and 66 and any applicable federal statute, the plaintiff may dismiss an action without a court order by filing:

(ii) a stipulation of dismissal signed by all parties who have appeared.

VOLUNTARY STIPULATION OF DISMISSAL WITH PREJUDICE OF DEFENDANT KOHL'S INC. PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 41

Defendant Kohl's Inc. filed an answer to Plaintiff's Complaint on September 8, 2020. Accordingly, the parties have resolved their claims and Defendant Kohl's Inc. may be dismissed from the Complaint for all purposes and without an Order.

Respectfully submitted,

Dated: September 21, 2021

By: /s/ Kyle W. Schumacher  
Kyle W. Schumacher, OSB No. 121887  
Schumacher Lane PLLC  
PO Box 558  
Spring Branch, TX. 78070  
Attorney for Plaintiff

Dated: September 21, 2021

By: /s/ Jeffrey G. Bradford  
Jeffrey G. Bradford, OSB No. 133080  
Tonkon Torp LLP  
888 SW Fifth Ave., Ste. 1600  
Portland, OR. 97204  
Attorney for Defendant  
Kohl's Inc.

VOLUNTARY STIPULATION OF DISMISSAL WITH PREJUDICE OF DEFENDANT KOHL'S INC. PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 41